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April 8, 1999

To: Mr. Michael McAteer
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Mr. Thomas Martin
Associate Regional Counsel
U. S. EPA - Region 5
77 West Jackson Boulevard (C-14J)
Chicago, Illinois 60604-3590

Mr. Paul Takacs
Illinois Environmental Protection Agency
Bureau of Land
1001 North Grand Ave. East
Springfield, IL 62702

**Re: Support Sampling Plan for Sauget Sites Area I January 21, 1999
Administrative Order by Consent**

Mr. McAteer, Mr. Martin and Mr. Takacs,

In a March 19, 1999 letter to Solutia, the U.S. Environmental Protection Agency (U.S. EPA) commented on and disapproved Solutia's February 22, 1999 Support Sampling Plan (SSP) submittal pursuant to the January 21, 1999 Administrative Order by Consent (AOC). The U.S. EPA required in the March 19 correspondence that Solutia submit "a final plan on or before April 9, 1999". U. S. EPA further stated that, "...failure to provide U.S. EPA with an approvable Support Sampling Plan that incorporates all attached comments and is in compliance with the AOC will be considered a violation of the AOC. In such event, U.S. EPA will consider its enforcement options including, but not limited to, completing the Support Sampling Plan with no further input from Solutia".

Solutia strongly objects to the U. S. EPA's threat of enforcement action on the basis that enforcement action is unjustified, unwarranted, unnecessary and counter-productive. Solutia has been cooperative with the U.S. EPA in voluntarily signing up to complete the AOC Work and obviously does not intend to be recalcitrant. Solutia has made a good

faith effort to comply with the AOC in the short 2 months since it became effective - taking every opportunity with the Agency to show this intent and making every reasonable effort to meet the Agency's expectations. Solutia is quite baffled at U. S. EPA's reasoning reflected in this quick resort to threats of enforcement action.

The enclosed SSP is submitted in accordance with the requirements of the AOC and Statement of Work (SOW); the U.S. EPA's March 19, 1999 comments on Solutia's February 22, 1999 Support Sampling Plan submittal; and the March 25 and March 26, 1999 telephone conference calls between Solutia and the U.S. EPA, USACE, Weston and Illinois EPA (IEPA), held to provide further clarification of the March 19, 1999 comments.

Solutia has made every effort possible to understand and affirmatively address each of the Agency's issues and concerns and knows of no reason why the current SSP submittal is not approvable by the Agency. We have used a qualified team of technical professionals and two peer reviewers experienced with Region V projects to add an additional level of assurance that this SSP submittal meets all applicable guidelines, requirements and expectations of U. S. EPA Region V.

Solutia is agreeing to perform all of the additional Work now encompassed within the SSP, even though the current Work is considerably more comprehensive and more complex than was originally envisioned during the AOC negotiations. As a consequence however, the SSP enforceable schedule proposal, while remaining aggressive, incorporates additional time needed to professionally and efficiently implement the expanded scope of work. Solutia is committed to aggressive execution of the Work and will continue to minimize total project time where practical and cost effective.

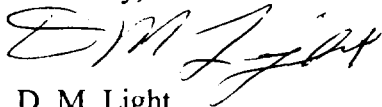
Some final details, clarifications and questions regarding the SSP submittal:

1. QAPP 7-step Process Review (Guidance for the Data Quality Objective Process: EPA QA/G-4, Final - September 1994) - The Solutia team is uncertain as to the Agency's expectation on this item. The 7-step review is not included as a part of the current submittal because it is not in the guidance we were instructed to use. However, the experience of some team members suggest that this may be an expectation of Region V. Solutia will comply with the Agency's clarified position on this matter. ✓ w/ QAPP person
2. Public participation - The SSP reflects Solutia's understanding that the U. S. EPA is responsible for the Community Relations Plan required by the NCP and that the Agency will take the lead in community relations and public participation activities. Solutia intends to support the Agency's community relations and public participation efforts and will participate as appropriate. Solutia requests Agency confirmation of concurrence with this understanding. OK
3. Ecological Health & Safety Officer - The Ecological Health and Safety Officer will be named by Menzie Cura within 30 days of this submission.

4. Biota Analysis SOPs - The biota analysis SOPs for the ecological sampling will be delivered within 30 days of this submittal.

Solutia and any member of the project team are available to meet with the Agency to review any questions you may have concerning this SSP submittal.

Sincerely,



D. M. Light
Manager, Remedial Projects
Solutia Inc.

cc: J. Nassif, Esq. - Thompson Coburn
L. Tape, Esq. - Thompson Coburn
B. Gilhousen, Esq. - Solutia
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